

Exhibit 4

March 25, 2022 Email

From: [Samuel Datlof](#)
To: [Durivage, Lee C.](#)
Cc: [Nina Menniti](#)
Subject: RE: [External Email] Reyes/Harris
Date: Friday, March 25, 2022 3:16:05 PM
Attachments: [image001.png](#)

Turning back to deposition dates, we spoke with our clients and checked internally about availability, and can now propose the following schedule for depositions. Let us know what you think.

Kelly – April 11 or April 12

Patrick – April 18 (Patrick will already be on the east coast at the beginning of this week for personal reasons, and we'd like to avoid having him fly across the country more than once before trial)

Harry – April 25 or 26

Margaret – May 2 or 3

Jim – May 9 or 10

Luis Miguel – May 16

Adrian – May 23

Benjamin, Miguel Angel, Mario – consecutive dates during week of May 30

I don't believe we received an answer to our previous email asking whether you plan to maintain your new position of not agreeing to remote depositions for out-of-country plaintiffs. We would like to raise the matter with the judge as soon as possible, so please let us know if that's the position you're sticking with.

Sam

Sam Datlof (he/his)

Staff Attorney

Justice at Work

Tel: (484) 430-1818

From: Durivage, Lee C. <LCDurivage@MDWCG.com>
Sent: Thursday, March 24, 2022 2:44 PM
To: Samuel Datlof <SDatlof@justiceatworklegalaid.org>
Cc: Nina Menniti <NMenniti@justiceatworklegalaid.org>
Subject: RE: [External Email] Reyes/Harris

Thanks, Sam – that's agreeable with me.

Lee



Lee C. Durivage
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From: Samuel Datlof <SDatlof@justiceatworklegalaid.org>

Sent: Thursday, March 24, 2022 1:04 PM

To: Durivage, Lee C. <LCDurivage@MDWCG.com>

Cc: Nina Menniti <NMenniti@justiceatworklegalaid.org>
Subject: RE: Reyes/Harris

WARNING: This email originated outside MDWCG
Lee,

We're happy to provide you an extension, but need both a reciprocal extension on our responses to your first doc requests/rogs as well as a 2 week extension to fact discovery. The extension to fact discovery will allow us to schedule the depositions at a reasonable pace that would otherwise be difficult given the delays. Let us know if this works for you.

We're planning to send you a proposed deposition schedule by the end of this week.

Sam

Sam Datlof (he/his)
Staff Attorney
Justice at Work
Tel: (484) 430-1818

From: Durivage, Lee C. <LCDurivage@MDWCG.com>
Sent: Thursday, March 24, 2022 11:34 AM
To: Samuel Datlof <SDatlof@justiceatworklegalaid.org>
Cc: Nina Menniti <NMenniti@justiceatworklegalaid.org>
Subject: [External Email] Reyes/Harris

Sam:

Do you mind providing me with an extension until Friday, April 1 to get you our discovery responses/documents. I'm waiting for final approval from my client on the responses and anticipate meeting with them next week to finalize. Obviously, we agreeable to a reciprocal extension as you may need.

Lee



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